

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Eric C. Grimm,

Plaintiff,

vs.

Raw Story Media, Inc., The Herald
Publishing Company, LLC, MLive
Media Group, f/k/a Booth Newspapers,
Inc., Newslo, Stephen Kloosterman,
Kevin Even, Paul Shibley, Brianna Scott,
David Bossenbroek, Matt J. Roberts, David
Shafer, Barton Dieters, Gregory
C. Pittman, Williams | Hughes, PLLC,
Douglas Hughes, Theodore N. Williams, Jr,
Timothy Hicks, William Marietti, Kathy
Hoogstra, Robert Carter, Raymond
Kostrzewa, Linnea Kostrzewa, Mark T.
Boonstra, Neil Mullally, Vicki Broge, The
Washington Times, LLC, and the County
of Muskegon,

Defendants.

Civil Action No. 17-cv-654

Hon. Gordon J. Quist
United States District Judge

Hon. Philip J. Green
United States Magistrate Judge

Eric C. Grimm (P58990)
ERIC C. GRIMM, PLLC
P.O. Box 1266
1017 West South Street
Alvin, TX 77512-1266
Main: (734) 717-4900
Fax: (888) 502-1291
Email: ecgrimm@umich.edu
Attorney for Plaintiff.

Steven F. Stapleton (P51571)
CLARK HILL, PLC
200 Ottawa Ave NW Ste 500
Grand Rapids, MI 49503
Main: (616) 608-1145
Fax: 616.608.1169
Email: sstapleton@clarkhill.com
Attorneys for Douglas M. Hughes, and
Williams | Hughes, PLLC

STIPULATION FOR EXTENSION OF TIME

This Stipulation relates to Docket Entry No. 35, a Rule 12(b)(6) Motion to Dismiss for Failure to State a Claim, asserted by several defendants all represented by CLARK HILL (Steven F.

Stapleton and Gregory Longworth) (specifically, the WILLIAMS | HUGHES, PLLC law firm and its surviving owner, Douglas M. Hughes). Messrs. Stapleton and Longworth's clients are all Movants in Doc. Ent. 35, and there are no other Movants. The Movants in Doc. Ent. 35, and the Plaintiff stipulate and agree that the Plaintiff's due-date to respond to the Motion to Dismiss (Doc. Ent. 35) shall be extended through and including **Thursday, January 25, 2018**.

Dated: January 9, 2018.

Respectfully submitted,

/s/ Eric C. Grimm
Eric C. Grimm (P58990)
ERIC C. GRIMM, PLLC
P.O. Box 1266
1017 West South Street
Alvin, TX 77512-1266
Main: (734) 717-4900
Fax: (888) 502-1291
Email: ecgrimm@umich.edu
Attorney for Plaintiff.

Respectfully submitted,

/s/ Steven F. Stapleton (with permission)
Steven F. Stapleton (P51571)
CLARK HILL, PLC
200 Ottawa Ave NW Ste 500
Grand Rapids, MI 49503
Main: (616) 608-1145
Fax: 616.608.1169
Email: ssapleton@clarkhill.com
Attorneys for Douglas M. Hughes, and
Williams | Hughes, PLLC

CERTIFICATE OF SERVICE

I certify that the foregoing Stipulation was electronically filed through the Court's ECM/CF System on January 9, 2018, and will therefore automatically be served by email on all Parties and counsel that have appeared.

/s/ Eric C. Grimm
Eric C. Grimm (P58990)
ERIC C. GRIMM, PLLC
P.O. Box 1266
1017 West South Street
Alvin, TX 77512-1266
Main: (734) 717-4900
Fax: (888) 502-1291
Email: ecgrimm@umich.edu

RE: stipulation

January 09, 2018 at 9:33 AM

From "Stapleton, Steven F."

I approve the language in this stipulation. In the Stipulation, my middle initial should be changed from "A." to "F." but otherwise looks fine. Thanks.

Steven F. Stapleton

CLARK HILL PLC

200 Ottawa Avenue N.W. Suite 500 | Grand Rapids, MI 49503

616.608.1145 (Direct) | 616.608.1169 (Fax) |

SStapleton@ClarkHill.com | www.clarkhill.com

From: Eric Grimm [<mailto:ecgrimm@me.com>]

Sent: Monday, January 8, 2018 8:01 PM

To: Stapleton, Steven F.

Subject: stipulation

it is attached

LEGAL NOTICE: This e-mail, along with any attachment(s), is considered confidential and may be legally privileged. If you have received it in error, please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it or use it for any purposes, or disclose its contents to any other person. Thank you for your cooperation.